

1  
2  
3  
4  
5  
6  
7 **UNITED STATES DISTRICT COURT**  
8 **WESTERN DISTRICT OF WASHINGTON**  
9 **TACOMA DIVISION**

10 PAUL De BALDO,

11 Plaintiff,

12 vs.

13 THE LINCOLN NATIONAL LIFE  
14 INSURANCE COMPANY,

15 Defendant.

Case No. 3:24-cv-05624-TMC

**ORDER GRANTING STIPULATED  
MOTION FOR EXTENSION OF TIME TO  
FILE ANSWER**

16 Plaintiff Paul De Baldo (“Plaintiff”) and Defendant The Lincoln National Life Insurance  
17 Company (“Lincoln”) have filed their Stipulated Motion for Extension of Time, up through and  
18 including October 16, 2024, for Lincoln to answer, present defenses, or otherwise respond to  
19 Plaintiff’s Complaint for ERISA Benefits (“Complaint”).

20 IT IS HEREBY ORDERED that Lincoln shall file its responsive pleading no later than  
21 October 16, 2024.

22  
23  
24  
25 DATED: September 16, 2024.

26   
TIFFANY M. CARTWRIGHT  
UNITED STATES DISTRICT JUDGE

1 Presented By:

2 OGLETREE, DEAKINS, NASH, SMOAK  
3 & STEWART, P.C.

4 By: /s/ Russell S. Buhite

5 Russell S. Buhite, WSBA #41257  
6 1201 Third Avenue, Suite 5150  
7 Seattle, WA 98101  
Telephone: (206) 693-7052  
Facsimile: (206) 693-7058  
Email: russell.buhite@ogletree.com

8 OGLETREE, DEAKINS, NASH, SMOAK  
9 & STEWART, P.C.

10 By: /s/ Paul J. Hulbert

11 Paul J. Hulbert, WSBA #55384  
12 15 W. South Temple, Suite 950  
13 Salt Lake City, UT 84101  
Telephone: (801) 658-6075  
Facsimile: (385) 360-1707  
Email: paul.hulbert@ogletree.com

14 *Attorneys for Defendant The Lincoln National*  
15 *Life Insurance Company*

16  
17 Approved as to Form; Presentation Waived:

18 EVERGREEN DISABILITY LAW

19 By: /s/ Jeremy L. Bordelon

20 Jeremy L. Bordelon, WSBA #53118  
21 465 NE 181st Avenue, Suite 500  
22 Portland, OR 97230  
Telephone: (503) 888-9331  
Facsimile: (503) 928-3533  
Email: jeremy@evergreenlaw.com

23 *Attorneys for Plaintiff Paul De Baldo*  
24  
25  
26

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of September, 2024, I served the foregoing [PROPOSED] ORDER GRANTING STIPULATED MOTION FOR EXTENSION OF TIME TO FILE ANSWER via the method(s) below on the following parties:

Jeremy L. Bordelon, WSBA #53118  
EVERGREEN DISABILITY LAW  
465 NE 181st Avenue, Suite 500  
Portland, OR 97230  
Telephone: (503) 888-9331  
Facsimile: (503) 928-3533  
Email: jeremy@evergreenlaw.com

*Attorneys for Plaintiff Paul De Baldo*

- ☒ by **electronic** means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed above.
- ☐ by **mailing** a true and correct copy to the last known address of each person listed above. It was contained in a sealed envelope, with postage paid, addressed as stated above, and deposited with the United States Postal Service in Seattle, Washington.
- ☐ by **e-mailing** a true and correct copy to the last known email address of each person listed above.

SIGNED THIS 13th day of September, 2024 at Seattle, Washington.

OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P.C.

By: /s/ Cheryl L. Kelley

Cheryl L. Kelley, Practice Assistant  
cheryl.kelley@ogletree.com